

At \_\_\_\_\_  
of the Supreme Court of the State of New  
York, 60 Centre Street, New York, NY  
on the \_\_\_\_ day of August, 2020

PRESENT: \_\_\_\_\_

J.S.C.

PEOPLE OF THE STATE OF NEW  
YORK, by LETITIA JAMES,  
Attorney General of the State of New  
York,

Petitioner,  
-against-

THE TRUMP ORGANIZATION,  
INC.; DJT HOLDINGS LLC; DJT  
HOLDINGS MANAGING  
MEMBER LLC; SEVEN SPRINGS  
LLC; ERIC TRUMP; CHARLES  
MARTABANO; MORGAN, LEWIS  
& BOCKIUS, LLP; and SHERI  
DILLON,

Respondents.

Index No. \_\_\_\_\_

Motion Sequence \_\_\_\_\_

**[PROPOSED] ORDER TO SHOW  
CAUSE – MOTION TO COMPEL**

Upon reading and filing of the Verified Petition, dated August 21, 2020; the First Affirmation of Matthew Colangelo in support of the Office of the Attorney General’s Order to Show Cause to Compel Compliance with Investigatory Subpoenas, dated August 21, 2020, and the exhibits annexed thereto; and the exhibits annexed thereto; the Certification of Merit Pursuant to 22 N.Y.C.R.R. 130-1.1(c); and upon the application of LETITIA JAMES, Attorney General of the State of New York, on behalf of the People of the State of New York;

And upon the affirmation that a good faith effort has been made to resolve the issues raised in this motion, as set forth in the accompanying First Affirmation of Matthew Colangelo dated August 21, 2020;

**LET** Respondents The Trump Organization, Inc., DJT Holdings LLC, DJT Holdings Managing Member LLC, Seven Springs LLC, Eric Trump, Charles Martabano, Morgan, Lewis & Bockius LLP, and Sheri Dillon (together, “Respondents”) or their counsel appear and show cause before IAS Part \_\_, of the Supreme Court, New York County, at the Courthouse located at 60 Centre Street, New York, New York 10007, on \_\_\_\_\_ at \_\_\_\_\_ a.m./p.m., or as soon thereafter as counsel can be heard, why an order should not be made pursuant to Civil Practice Law and Rules 2308(b), 402 and 403:

- (1) Compelling Respondents to comply in full with OAG’s subpoenas *ad testificandum*, and to give testimony without withholding responsive information on the basis of any privilege Respondents have asserted;
- (2) Compelling Respondents to comply in full with OAG’s subpoenas *duces tecum*, including by immediately disclosing without redaction all responsive documents over which Respondents have asserted privilege; and
- (3) granting such other, further, and additional relief as this Court may deem just and proper.

**SUFFICIENT CAUSE** being alleged therefore, it is

**ORDERED** that service of a copy of this Order, and the papers upon which it was granted, upon Respondents:

- (1) by email to Respondents the Trump Organization, DJT Holdings LLC, DJT Holdings Managing Member LLC, Seven Springs LLC, and Eric Trump’s counsel, LaRocca Hornik Rosen & Greenberg LLP, by Larry Rosen, Esq., at lrosen@lhr gb.com, on or before \_\_\_\_\_;

(2) by email to Respondent Eric Trump's counsel, Mukasey Frenchman & Sklaroff LLP, by Marc Mukasey, Esq., at Marc.Mukasey@MukaseyLaw.com, and Law Offices of Alan S. Futerfas, by Alan Futerfas, Esq., at asfuterfas@futerfaslaw.com, on or before \_\_\_\_\_;

(3) by email to Respondent Charles Martabano's counsel, by George Calcagnini, Esq., at gcalcagnin@aol.com, on or before \_\_\_\_\_;

(4) by email to Respondent Morgan, Lewis & Bockius LLP's counsel, Morgan, Lewis & Bockius LLP, by Zane Memeger, Esq., at zane.memeger@morganlewis.com, and Nathan Andrisani, Esq., at nathan.andrisani@morganlewis.com, on or before \_\_\_\_\_; and

(5) by email to Respondent Sheri Dillon's counsel, Zuckerman Spaeder LLP by Graeme Bush, Esq., at gbush@zuckerman.com, and Catherine Duval, Esq. at CDuval@zuckerman.com, on or before \_\_\_\_\_

be deemed good and sufficient service; and it is further

**ORDERED** that any opposition papers shall be served on Petitioner by email to Petitioner's counsel, OAG, by Matthew Colangelo at Matthew.Colangelo@ag.ny.gov on \_\_\_\_\_, six business days before the date set forth above for the hearing on Petitioner's motion to compel; and

**ORDERED** that any reply papers shall be served on Respondents by email to Respondents' counsel at lrosen@lhr gb.com, Marc.Mukasey@MukaseyLaw.com, asfuterfas@futerfaslaw.com, gcalcagnin@aol.com, zane.memeger@morganlewis.com, nathan.andrisani@morganlewis.com, gbush@zuckerman.com, and cduval@zuckerman.com on

\_\_\_\_\_, one business day before the date set forth above for the hearing on Petitioner's motion to compel.

ENTER:

\_\_\_\_\_  
J.S.C. \_\_\_\_\_